



Comments from LIUNA Minnesota & North Dakota

May 3, 2020

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE:

In the Matter of Xcel Energy's Petition for Approval of 2021 True-up Mechanisms
PUC Docket Number: E-002/M-20-743

In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota
PUC Docket Number: E-002/GR-20-723

Dear Mr. Seuffert,

LIUNA Minnesota & North Dakota ("LIUNA") offers the following reply to comments filed by stakeholders in the above-listed dockets. We agree strongly with the Office of the Attorney General Residential Utilities Division ("OAG-RUD") that the correction made by Xcel to the company's projected revenue requirements do not change the basis for the Public Utility Commission's action in the case, and do not form a reasonable basis for the Commission to reconsider its Order.

The decision to postpone a rate case provided badly-needed relief to residential and small business ratepayers -- including LIUNA members and employers -- who have been hit hard by the COVID-19 pandemic and accompanying recession. The OAG-RUD analysis shows that the revenue requirement change would not result in any material change to the comparative benefits of a rate case or a stay out, and therefore are not relevant to the Commission's conclusions.

The Commission made the right choice in this case: a choice that protected the most vulnerable ratepayers, freed up utility and agency staff time to focus on other important matters, and facilitated investments that are improving the Xcel system, delivering benefits to ratepayers, and creating jobs and economic development. Xcel Large Industrials fails to show that the change meets the test for Reconsideration. We urge the Commission to reaffirm its decision in this case.

As always, we appreciate the opportunity to comment.

Kevin Pranis
Marketing Manager